

**JENNIFER BERGH**

Nevada Bar No. 14480

**QUILLING SELANDER LOWNDS**

**WINSLETT & MOSER, P.C.**

6900 N. Dallas Parkway, Suite 800

Plano, Texas 75024

Telephone: (214) 560-5460

Facsimile: (214) 871-2111

[jbergh@qslwm.com](mailto:jbergh@qslwm.com)

**COUNSEL FOR TRANS UNION LLC**

**\*\*Designated Attorney for Personal Service\*\***

Kurt Bonds, Esq.

Nevada Bar No.: 6228

6605 Grand Montecito Parkway, Suite 200

Las Vegas, Nevada 89149

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

BUCK NOLAN BARHAM,

Plaintiff,

v.

NATIONAL BUSINESS FACTORS, INC. OF  
NEVADA, EQUIFAX INFORMATION  
SERVICES LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC., and TRANS UNION LLC,

Defendants.

Case No. 2:21-cv-01930-JCM-NJK

**JOINT MOTION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT  
(FIRST REQUEST)**

Plaintiff Buck Nolan Barham ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

1. On October 19, 2021, Plaintiff filed his Complaint. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is December 21, 2021.

2. On December 21, 2021, counsel for Trans Union communicated with Plaintiff's counsel via email regarding an extension within which to file a response to the Complaint, and Plaintiff's counsel agreed to the extension.

3. The parties will actively discuss a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties' time and expense. The additional time will allow Plaintiff and Trans Union time to fully explore such early settlement discussions.

4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.

5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including January 20, 2022. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 21st day of December 2021.

QUILLING SELANDER LOWNDS  
WINSLETT & MOSER, P.C.

/s/ Jennifer Bergh

Jennifer Bergh  
Nevada Bar No. 14480  
[jbergh@qslwm.com](mailto:jbergh@qslwm.com)  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 560-5460  
(214) 871-2111 Fax

**NO FURTHER EXTENSIONS WILL  
BE GRANTED.**

**IT IS SO ORDERED.**

Dated: December 22, 2021

**COUNSEL FOR TRANS UNION LLC**

**COGBURN LAW**

  
\_\_\_\_\_  
Nancy J. Koppe  
United States Magistrate Judge

/s/ Erik W. Fox

Jamie S. Cogburn  
Nevada Bar No. 8409  
[jsc@cogburncares.com](mailto:jsc@cogburncares.com)  
Erik W. Fox  
Nevada Bar No. 8804  
[ewf@cogburncares.com](mailto:ewf@cogburncares.com)  
2580 St. Rose Parkway, Suite 330  
Henderson, Nevada 89074  
(702) 748-7777